

# **EXHIBIT F**

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Attorneys for Proposed Lead Plaintiffs  
Steelworkers Pension Trust and the  
Police and Fire Retirement System of the  
City of Detroit

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JOEL EICHENHOLTZ, Individually And  
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC.,  
DOUGLAS G. BERGERON, and BARRY  
ZWARENSTEIN,

Defendants.

Case No. 07-cv-06140 MHP

CLASS ACTION

**JOINT DECLARATION OF RONALD  
ZAJAC AND RICHARD HOFFMANN  
IN SUPPORT OF THE MOTION OF  
THE STEELWORKERS PENSION  
TRUST AND THE POLICE AND FIRE  
RETIREMENT SYSTEM OF THE CITY  
OF DETROIT FOR APPOINTMENT AS  
LEAD PLAINTIFFS**

**Date: March 10, 2008  
Time: 2:00 p.m.  
Courtroom: 15, 18<sup>th</sup> Floor  
Judge: Hon. Marilyn H. Patel**

JURY TRIAL DEMANDED

BRIAN VAUGHN, RON DOCKSWELL  
and MIRIAM LOGAN, On Behalf of  
Themselves And All Others Similarly  
Situating,

Plaintiff,

v.

VERIFONE HOLDINGS, INC.,  
DOUGLAS G. BERGERON, and BARRY  
ZWARENSTEIN,

Defendants.

Case No. 07-cv-06197 VRW

PETER LIEN, Individually And On Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC.,  
DOUGLAS G. BERGERON, and BARRY  
ZWARENSTEIN,

Defendants.

Case No. 07-cv-06195 JSW

ALBERT L. FELDMAN and ELEANOR  
JEAN FELDMAN, Individually And On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC.,  
DOUGLAS G. BERGERON, and BARRY  
ZWARENSTEIN,

Defendants.

Case No. 07-cv-06218 MMC

KURT HILL, On Behalf of Himself and All  
Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC.,  
DOUGLAS G. BERGERON, and BARRY  
ZWARENSTEIN,

Defendants.

Case No. 07-cv-06238 MHP

WESTEND CAPITAL MANAGEMENT  
LLC, Individually And On Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC.,  
DOUGLAS G. BERGERON, and BARRY  
ZWARENSTEIN,

Defendants.

Case No. 07-cv-06237 MMC

DONALD CERINI, Individually And On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC.,  
DOUGLAS G. BERGERON, and BARRY  
ZWARENSTEIN,

Defendants.

Case No. 07-cv-06228 SC

DANIEL OFFUTT, Individually And On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC.,  
DOUGLAS G. BERGERON, and BARRY  
ZWARENSTEIN,

Defendants.

Case No. 07-cv-06241 JSW

EDWARD FEITEL, On Behalf of Himself  
and All Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC.,  
DOUGLAS G. BERGERON, and BARRY  
ZWARENSTEIN,

Defendants.

Case No. 08-cv-0118 CW

1 Ronald Zajac and Richard Hoffmann, pursuant to 28 U.S.C. § 1746, declare as follows:

2 1. We respectfully submit this Joint Declaration in support of the application of the  
3 Steelworkers Pension Trust ("Steelworkers") and the Police and Fire Retirement System of the  
4 City of Detroit ("Detroit P&F") to be appointed as Lead Plaintiffs in the above-captioned cases  
5 concerning VeriFone Holdings, Inc. ("VeriFone") pursuant to the Private Securities Litigation  
6 Reform Act of 1995 ("PSLRA"). We both have personal knowledge about the information in  
7 this Joint Declaration.

8 2. I, Ronald Zajac, am General Counsel for the Police and Fire Retirement System  
9 of the City of Detroit. Detroit P&F is a public pension fund organized for the benefit of active  
10 and retired policemen and firemen of the City of Detroit. I am informed of and understand the  
11 requirements and duties imposed by the PSLRA. On December 6, 2007, the Board of Trustees  
12 passed a resolution authorizing Detroit P&F to seek to be appointed Lead Plaintiff in this action.  
13 After due consideration, and after a direct telephonic conversation with Mr. Hoffmann in which  
14 no outside counsel participated, I determined that it was in the best interests of Detroit P&F and  
15 the Class to file a joint motion to have Detroit P&F appointed Lead Plaintiff together with  
16 Steelworkers.

17 3. I, Richard Hoffmann, am the General Counsel of Steelworkers Pension Trust.  
18 Steelworkers is multi-employer pension plan with approximately \$2 billion in assets. As  
19 reflected in its Certification, Steelworkers purchased a significant number of shares of VeriFone  
20 and suffered substantial loss as a result of the violations as alleged in these actions. I am  
21 informed of and understand the requirements and duties imposed by the PSLRA. After due  
22 consideration, and after a direct telephonic conversation with Mr. Zajac in which no outside  
23 counsel participated, Steelworkers determined to file a motion to have Steelworkers appointed  
24 Lead Plaintiff together with Detroit P&F.

25 4. Steelworkers and Detroit P&F are dedicated to maximizing the recovery to  
26 members of the Class in this Action and the strengthening of corporate governance to protect  
27 investors from fraudulent reporting by publicly traded companies such as VeriFone. After  
28 reviewing the allegations in the above-captioned actions and determining that both Steelworkers

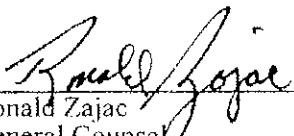
1 and Detroit P&F have suffered significant losses as a result of investments in VeriFone, and prior  
2 to filing a Lead Plaintiff motion under the PSLRA, we approved the filing of a joint motion for  
3 appointment as Lead Plaintiffs.

4 5. As a result of the significant losses suffered by Steelworkers and Detroit P&F,  
5 and their common goals as institutional investors to serve as Lead Plaintiffs in this action under  
6 the PSLRA, Steelworkers and Detroit P&F decided to join together to prosecute this action as  
7 Lead Plaintiffs for the Class. To that end, Steelworkers and Detroit P&F have coordinated their  
8 actions herein and have communicated with each other, including through a direct telephonic  
9 conference in which no outside counsel participated, to discuss strategy and procedures for  
10 directing this litigation and monitoring counsel.

11 6. We understand that the Lead Plaintiff's role under the PSLRA is to select and  
12 retain Lead Counsel and to supervise the prosecution of the case. We believe our selected  
13 counsel are highly experienced and adequate to represent the interests of the Class. We are  
14 committed to overseeing Lead Counsel's prosecution of this litigation to ensure that the case is  
15 handled efficiently and without duplication of work.

1           7.       We understand further that it is the obligation of the Lead Plaintiff and Lead  
2 Counsel to vigorously prosecute the action on behalf of all Class members and to maximize the  
3 recovery obtainable by all Class members from all culpable parties.

4           We declare under penalty of perjury that the foregoing is true and correct to the best of  
5 our knowledge. Executed this 4<sup>th</sup> day of February, 2008.

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7   
8 Ronald Zajac  
9 General Counsel  
Police and Fire Retirement System of the City of Detroit

10  
11 Richard Hoffmann  
12 General Counsel  
Steelworkers Pension Trust

1           7. We understand further that it is the obligation of the Lead Plaintiff and Lead  
2 Counsel to vigorously prosecute the action on behalf of all Class members and to maximize the  
3 recovery obtainable by all Class members from all culpable parties.

4           We declare under penalty of perjury that the foregoing is true and correct to the best of  
5 our knowledge. Executed this 1<sup>st</sup> day of February, 2008.

6  
7  
8           \_\_\_\_\_  
9 Ronald Zajac  
General Counsel  
Police and Fire Retirement System of the City of Detroit

10           \_\_\_\_\_  
11 Richard Hoffmann  
12 General Counsel  
Steelworkers Pension Trust